

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Arman Mkrtchyan

Case No. 17-mj-946-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 13, 2017 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

## Code Section

18 U.S.C. Section 1029(a)(3)

18 U.S.C. Section 1028A

## Offense Description

Access device fraud (possession of 15 or more counterfeit access devices)

Aggravated identity theft

This criminal complaint is based on these facts:

On or about February 13, 2017, in the Eastern District of Pennsylvania, defendant Arman Mkrtchyan committed access device fraud by possessing fifteen or more counterfeit access devices and committed aggravated identity theft, in violation of Title 18, United States Code, Sections 1029(a)(3) and 1028A.  
 See attached Affidavit

☒ Continued on the attached sheet.


Complainant's signature

Alex Broomfield, Special Agent, USSS

Printed name and title

Sworn to before me and signed in my presence.

Date: July 13, 2017City and state: Philadelphia, PA


Judge's signature

Honorable David R. Strawbridge

Printed name and title

## AFFIDAVIT

I, Alex Broomfield, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the United States Secret Service. I have been employed by this agency for approximately 1 year and 10 months. I have had approximately 7 years of experience in the investigation of fraud and identity theft offenses. I am presently assigned to the Philadelphia Field office which investigates financial crimes, among other violations of Federal law. Prior to my employment with the United States Secret Service, I worked as a Senior Police Officer in the State of Georgia where I investigated various felonious crimes to include fraud and identity theft. Based upon my training, knowledge, experience and collaboration with other agents, I have advanced my skills in identifying and investigating federal crimes, including those relating to fraud and identity theft, and have become familiar with the methods and schemes that individuals use to commit such crimes.

2. The information in this Affidavit is based upon my personal knowledge and my discussions with, and review of reports of, other law enforcement officers. Because this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, what follows is not all of the information that has been uncovered during this investigation.

3. This Affidavit is in support of an application for an arrest warrant for Arman Mkrtchyan for violations of Title 18, United States Code, Sections 1029(a)(3)(possession of fifteen or more counterfeit access devices) and 1028A (aggravated identity theft) in connection with an on-going investigation into an access device fraud and identity theft scheme operating in the Eastern District of Pennsylvania and elsewhere.

4. On or about February 13, 2017, ARMAN MKRTCHYAN was detained at the Philadelphia International Airport after a Transportation Security Administration (“TSA”) employee, in pre-flight screening of MKRTCHYAN and his carry-on luggage, discovered, in MKRTCHYAN’s carry-on luggage a hollow shaving cream can containing green leafy substance and a velvet drawstring bag containing twenty-three (23) blank white cards with magnetic stripes and chips, each with a hand-written four (4) digit code on the back, and eleven (11) telephone cards with magnetic strips, each with a hand-written four (4) digit code on the back.

5. I responded to a call from the Philadelphia Police Department, Airport Division, and conducted a scan of the thirty-four (34) cards recovered from MKRTCHYAN’s carry-on luggage. Each of those cards was re-encoded with the following credit or debit account information of individuals other than MKRTCHYAN:

<u>Type of Card</u>	<u>Issuer of Card</u>	<u>Last 4 Digits of Account Number Encoded on Card</u>	<u>Initials of Name Encoded on Card</u>
Blank white card	State Employees’ Credit Union	9304	R.R.
Blank white card	Bank of America	4635	V.S.
Blank white card	PNC Bank	4137	C.L.
Blank white card	Regions Bank	8894	R.R.
Blank white card	Bank of America	5434	G.B.
Blank white card	Bank of America	8708	B.G.
Blank white card	Capital One	6437	G.K.
Blank white card	TD Bank	1041	None
Blank white card	Vystar Credit Union	3398	R.R.
Blank white card	Navy Federal Credit Union	4818	N.M.
Blank white card	PNC Bank	3652	None
Blank white card	SunTrust Bank	5251	None
Blank white card	UMB Bank	4533	N.S.
Blank white card	PNC Bank	6407	R.R.
Blank white card	USAA Savings Bank	3631	M.M.
Blank white card	PNC Bank	7728	R.R.

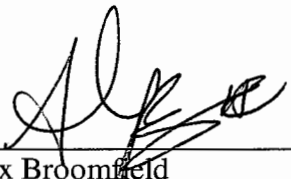
<u>Type of Card</u>	<u>Issuer of Card</u>	<u>Last 4 Digits of Account Number Encoded on Card</u>	<u>Initials of Name Encoded on Card</u>
Blank white card	Wilmington Trust	6209	None
Blank white card	Wells Fargo Bank	0242	R.R.
Blank white card	PNC Bank	6187	R.R.
Blank white card	PNC Bank	8901	R.R.
Blank white card	PNC Bank	9114	R.R.
Blank white card	PNC Bank	2989	R.R.
Blank white card	USAA Savings Bank	3631	M.M.
Telephone card	TD Bank	4690	I.S.
Telephone card	Capital One	1118	R.C.
Telephone card	PSCU Inc.	6761	None
Telephone card	Capital One	0010	R.C.
Telephone card	USAA Savings Bank	2165	A.M.
Telephone card	USAA Savings Bank	2402	M.O.
Telephone card	SunTrust Bank	1602	None
Telephone card	Capital One	3443	D.A.
Telephone card	Capital One	5407	N.E.
Telephone card	Capital One	4004	R.C.
Telephone card	Wells Fargo Bank	2182	N.C.

6. I learned that Philadelphia police officers contacted victim M.O., a resident of Washington, DC, and M.O. stated that an unknown person had used his USAA Savings Bank Visa debit card number ending in 2402 to withdraw \$380.00 from his account at an ATM in Maryland and that two additional attempts to make ATM withdrawals from his account had been made as well.

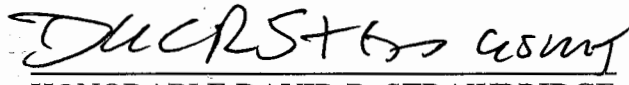
7. I also learned that Philadelphia police officers contacted victim M.M. who confirmed that she did not authorize anyone, including ARMAN MKRTCHYAN, to use her USAA Saving Bank debit account number.

8. At the time of these offenses, the financial institutions that issued the account numbers were companies doing business in interstate commerce.

9. Based on the above facts, there is probable cause to believe that ARMAN MKRTCHYAN committed access device fraud by possessing fifteen or more counterfeit access device cards, in violation of 18 U.S.C. §§ 1029(a)(3), and committed aggravated identity theft in violation of 18 U.S.C. §§ 1028A.

  
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Alex Broomfield  
Special Agent  
United States Secret Service

Sworn and Subscribed before me  
this 13<sup>th</sup> of July, 2017

  
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HONORABLE DAVID R. STRAWBRIDGE  
United States Magistrate Judge